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July 22, 2014

VIA ECF

Judge Joseph F. Bianco
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York

Re: Elizabeth Atwood v. Cohen & Slamowitz, et al.
Case No.: 2:14-cv-02973-JFB-AKT
Our File No.: 11471.00007

Dear Judge Bianco:

We represent defendants Cohen & Slamowitz, LLP, Mitchell Selip, Mitchell G. Slamowitz and David A. Cohen ("Defendants"), and write with the consent of the plaintiff.

Pursuant to Your Honor's direction at the pre-motion conference on July 15, 2014, Defendants have produced the "account notes" to the plaintiff in the hopes that certain issues would be resolved, with the possibility of an amended pleading being filed. Your Honor also instructed this office to write to the Court by July 22, 2014 with a proposed briefing schedule to be worked-out by the parties.

To that end, the parties respectfully submit the following proposed schedule:

- Plaintiff to file an amended complaint by August 7,
- Defendants to serve a motion to dismiss by August 22,
- Plaintiff to serve any opposition by September 5,
- Defendants' reply to be served by September 15, and
- Motion to be filed with the Court by September 16, 2014.

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If the Court needs any additional information, please do not hesitate to ask.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker

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cc.:

VIA ECF and E-mail

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